

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2009-473-W/S

IN RE:)
)
Application of Tega Cay Water)
Service, Inc. for adjustment of)
rates and charges and modifications to)
certain terms and conditions for the)
provision of water and sewer service.)
_____)

REBUTTAL TESTIMONY
OF
CARL DANIEL

1 **Q. ARE YOU THE SAME CARL DANIEL THAT HAS PREFILED DIRECT**
2 **TESTIMONY IN THIS CASE?**

3 A. Yes, I am.

4

5 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS**
6 **PROCEEDING, MR. DANIEL?**

7 A. The purpose of my rebuttal testimony is to respond on behalf of Tega Cay Water
8 Service, Inc. to portions of the pre-filed direct testimony of Willie Morgan on behalf of
9 the South Carolina Office of Regulatory Staff, or “ORS” related to the Company’s
10 proposed tariff revision regarding cross-connection inspections.

11

1 **Q. DOES THE COMPANY AGREE WITH MR. MORGAN'S SUGGESTED RATE**
2 **SCHEDULE LANGUAGE WITH RESPECT TO CROSS-CONNECTION**
3 **INSPECTION?**

4 A. The Company does not believe that ORS's proposal that TCWS be required to
5 provide customers a 30-day advance written notice of the recurring date when the
6 customer must have their backflow prevention device tested is properly included in a rate
7 schedule. As the Commission is aware, DHEC Regulation 61-58.7.F requires customers
8 with a cross-connection and a backflow prevention device to have the device inspected
9 annually by a certified inspector. This regulation is to ensure safe operation of the water
10 system and to prevent contaminated water from entering the drinking water system.
11 These connections are neither installed by the Company nor at its direction; to the
12 contrary, many, if not most, cross-connections occur without the Company's knowledge.
13 These cross-connections may consist of irrigation wells, swimming pools, fish ponds and
14 the like and it is the customer's responsibility to install, maintain and test annually a
15 backflow prevention device to prevent contamination of potable water from these
16 sources. However, as indicated in its proposed rate schedule, the Company has no
17 objection to providing customers a thirty-day written notice that their service will be
18 disconnected if the customer does not have the backflow prevention device independently
19 tested. TCWS also would not object to informing customers of DHEC's website and
20 contact information. Because cross-connections may occur independently of the
21 Company at the instance of individual customers and are subject to DHEC regulations
22 requiring this testing, TCWS also does not believe the language proposed by ORS is
23 appropriately included in its rate schedule.

1 **Q. DOES THIS CONCLUDE YOUR REBUTAL TESTIMONY?**

2 **A. Yes.**

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